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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91220335
Party	Defendant Luanis S.A.
Correspondence Address	JOHN L WELCH WOLF GREENFIELD & SACKS PC 600 ATLANTIC AVE BOSTON, MA 02210 UNITED STATES jlwtrademarks@wolfgreenfield.com
Submission	Other Motions/Papers
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Date	09/15/2015
Attachments	Opposition of Luanis S.A. to Motion to Consolidate Three Proceedings and to Suspend.pdf(67361 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Charles B.H. James and Louise D.B. James,)	
)	
Opposers,)	
)	
v.)	Opposition No.
)	91220335
Luvanis S.A.,)	
)	
Applicant.)	

Charles B.H. James and Louise D.B. James,)	
)	
Opposers,)	
)	
v.)	Opposition No.
)	91220654
Luvanis S.A.,)	
)	
Applicant.)	

Charles B.H. James and Louise D.B. James,)	
)	
Petitioners,)	
)	
v.)	Cancellation No.
)	92060907
Luvanis S.A.,)	
)	
Respondent.)	

OPPOSITION OF LUVANIS S.A. TO MOTION TO CONSOLIDATE
THREE PROCEEDINGS AND TO SUSPEND

Luanis S.A., by its counsel, hereby opposes the motion of Plaintiffs Charles B.H. James and Louise D.B. James to consolidate the three above-identified proceedings and to suspend the resulting consolidated proceeding.

Concurrently with this opposition paper, Defendant Luanis, S.A. is filing a motion to consolidate four proceedings (including the three captioned above) and to re-set the discovery and testimony dates in the resultant consolidated proceeding. Such consolidation will permit Luanis to complete its discovery in all four proceedings in an orderly and convenient fashion, while minimizing the time and effort of the parties and the Board in that the four cases will proceed together to a simultaneous conclusion.

Luanis therefore refers the Board to its MOTION TO CONSOLIDATE FOUR PROCEEDINGS AND TO RE-SET DISCOVERY AND TRIAL DATES, filed concurrently herewith.

Luanis S.A.



John L. Welch.
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon Plaintiffs this 15th day of September, 2015, by mailing a copy thereof via first-class mail, postage pre-paid, to their counsel, Mark Lerner, Esq., Satterlee Stephens Burke & Burke LLP, 230 Park Avenue, New York, New York 10169.

A handwritten signature in cursive script that reads "John L. Welch". The signature is written in dark ink and is positioned above a horizontal line.

John L. Welch